

EXHIBIT A PLAINTIFFS' PROPOSED DISCOVERY PLAN

	<u>PHASE I</u> ~ 29 Depositions taken by Plaintiffs		Status Conference for Case Evaluation/ Settlement	<u>PHASE II</u> ~ 35 Depositions taken by Plaintiffs		Status Conference for Case Evaluation/ Settlement	<u>PHASE III</u> ~ 33 Depositions taken by Plaintiffs		Status Conference for Case Evaluation/ Settlement
Plaintiffs' Discovery	Named Defendants Implicated in Individual Use of Force Incidents (25)	C. Graham: Complete - 1 depo taken	April 7 - 11, 2014	Named Defendants Implicated in Individual Use of Force Incidents (14)	L. Pickering: 2 Defendants	June 16 -20, 2014	Named Defendants Implicated in Individual Use of Force Incidents <i>Open Investigations</i> (13)	O. Sanders: 5 Defendants	TBD
		R. Nunez: Complete - 2 depos taken			K. Bacote for 10/2010 incident: 6 Defendants			S. Ortiz: 2 Defendants	
		J. DeGros: Complete - 2 depos taken			R. Brye for 2012 incident: 4 Defendants			R. Brye for 2011 incident: 4 Defendants	
		S. Smallwood: Complete - 4 depos taken			T. Woods: 2 Defendants			C. Sewell: 2 Defendants	
		M. Nunez: 2 depos taken, 3 depos noticed, 1 to be noticed							
		T. Woods: 1 depo taken, 4 depos confirmed, 1 depo noticed							
		K. Bacote for 4/2010 incident: 3 depos confirmed, 1 depo noticed							
Named Supervisory Defendants (4)	Rose Agro-Doyle Kathleen Mulvey Emmanuel Bailey Edmond Duffy	Named Supervisory Defendants (0)		Named Supervisory Defendants (11)	Dora Schriro Evelyn Mirabal Larry Davis, Sr. Mark Scott Michael Hourihane Carmine LaBruzzo Current Deputy Chief of Security Florence Finkle Carlton Newton Robert Cripps Ronald Jorgensen				
Non-Party Witnesses (4)	Dr. Homer Venters Amanda Masters 30(b)(6) regarding video surveillance policies 30(b)(6) regarding training	Non-Party Witnesses (8)	Ruben Benitez Sean Cussen Janet Gooding Erik Berliner Brian Suprenant Sabina Blaskovic Mark Cranston Lewis Finkleman	Non-Party Witnesses (1)	Linda Gibbs				
Defendants' Discovery	Deposition of Plaintiffs	Christopher Graham, Ralph Nunez, Shameik Smallwood, Jose DeGros	Deposition of Plaintiffs	TBD	Deposition of Plaintiffs	TBD			
	Other Depositions	TBD	Other Depositions	TBD	Other Depositions	TBD			

¹ As of March 5, 2014.